

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING, LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

MANIFOLD MARKETS, INC., MANIFOLD
FOR CHARITY, INC., ROSS RHEINGANS-
YOO, and FTX PHILANTHROPY, INC.,

Defendants.

Adv. Pro. No. 24-50214 (KBO)

**DECLARATION OF ROSS RHEINGANS-YOO IN SUPPORT OF HIS
MOTION FOR SANCTIONS UNDER FEDERAL RULE OF BANKRUPTCY
PROCEDURE 9011, 28 U.S.C. § 1927, and 11 U.S.C. § 105**

Ross Rheingans-Yoo hereby declares under penalty of perjury as follows:

1. I am the claimant of the FDU Claim¹ and a defendant in the above-captioned adversary proceeding. I submit this declaration in support of my motion, pursuant to Rule 9011 of the Federal Rules of Bankruptcy Procedure, 28 U.S.C. § 1927, and 11 U.S.C. § 105, for an order imposing sanctions on the Trust and its counsel for filing the Trust's First Amended Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 105, 544, 548, and 550 and Del.

¹ Capitalized terms used but not defined herein have the meaning ascribed to such terms in the Amended Complaint (as defined below) or my Supplemental Response to Debtors' Objection to Claim [D.I. 29572], as applicable

Code Ann. Tit. 6, § 1304 and 1305, and for Disallowance or Subordination of Claim Pursuant to 11 U.S.C. §§ 502 and 510 [Adv. Pro. D.I. 38, “Amended Complaint”], and its Motion for Reconsideration or to Modify Order Allowing Rheingans-Yoo’s FDU Claim [D.I. 31846, “Motion for Reconsideration”].

2. I wrote on my personal website in 2020 – long before I was hired by FTX – that I believe programs where individual donors are given the opportunity to craft mid-six-figure-sized philanthropic programs are “the single most effective mechanism for doing the most thoughtful good in the world ... for ... people who would like the chance to think more about how to do good more effectively.”

3. I have donated over \$140,000 of my own money to Manifold for Chairty, an Effective Altruist (“EA”) cause.

4. Manifold for Charity has never paid its directors.

5. Nishad Singh is not currently working at Manifold for Charity, nor was he doing so on July 23, 2025.

6. When the Trust filed the Amended Complaint and Motion for Reconsideration, and I learned that the Trust believed that donating the FDU Bonus to Manifold for Chairty is unjust, I disagreed with that contention but voluntarily redesignated the beneficiary to 1Day Sooner, Inc., an EA cause that is not litigating with the Trust, to avoid litigation and conserve judicial resources.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 12, 2025
New York, New York

/s/ Ross Rheingans-Yoo